@ BELLSOUTH

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July 9, 2002

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OFFICE OF THE EXECUTIVE SECRETARY

VIA HAND DELIVERY

Hon. Sara Kyle, Chairman Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37238

Re: BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996

Docket No. 97-00309

Dear Chairman Kyle:

Enclosed are the original and fourteen copies of BellSouth's Supplemental Responses to Consolidated CLEC 1st Data Requests Item Nos. 15, 71, 72, 73 and 105. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch



BellSouth Telecommunications, Inc.
Tennessee Regulatory Authority
Docket No. 97-00309
Consolidated CLEC 1st Data Requests
May 23, 2002
SUPPLEMENTAL Item No. 15
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REQUEST: Please identify all modifications to BellSouth's systems, processes, and procedures necessary to collect and present data in reports that will comply with the permanent set of performance measurements adopted by the Tennessee regulatory Authority in Docket No. 01-00193 and

- (a) provide a detailed schedule for completing each modification listed;
- (b) describe the resources necessary to complete each modification listed; an
- (c) if any listed modifications cannot be completed within 30 days, please state the reason(s) for the delay in completing that modification.

RESPONSE: On June 28, 2002, the Authority entered its Amended Final Order Granting Reconsideration and Clarification and Setting Performance Measurements, Benchmarks and Enforcement Mechanisms in Docket No. 01-00193. The Order is lengthy and complex, and BellSouth is in the process of reviewing and analyzing the requirements of the Order. BellSouth is not in a position to respond to the specific questions set forth in (a) through (c), above.

BellSouth has submitted numerous filings in Docket No. 01-00193 with respect to implementation issues relating to earlier Authority orders. Those documents are publicly available and have already been served on the CLECs that are party to that docket.

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REQUEST:

What event (Service Order Completion, CSR update, etc.) triggers the notification of BellSouth retail that a customer has left and when does this happen (e.g. FOC, SOC)?

RESPONSE: No event that takes place with regard to a customer's records (such as Service Order Completion, CSR updated, etc.) triggers notification to BellSouth retail personnel that a customer has left BellSouth. explained in BellSouth's Supplemental Response to Item No. 72, however, BellSouth does generate lists of customers that BellSouth assumes have left BellSouth to receive local service from a competitor, and BellSouth distributes these lists to certain retail personnel.

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REQUEST:

Please describe in detail the manner in which BellSouth's "winback centers" or other winback personnel are informed that a BellSouth retail customer has left.

RESPONSE: BellSouth generates lists of customers that BellSouth assumes have left BellSouth to receive local service from a competitor. BellSouth distributes these lists to certain retail personnel. These lists are generated in the following manner.

> When BellSouth retail personnel receive a disconnect request from an end user (as opposed to BellSouth wholesale personnel receiving a disconnect request from a CLEC regarding an end user's service), BellSouth retail personnel enter one of several disconnect codes into that end user's retail billing records. To generate the lists described above, BellSouth identifies all customers who have disconnected service during a given time period. BellSouth then eliminates any such customers whose retail records have a retail disconnect code that indicates a non-competitive reason for the service disconnection. Those customers that remain are assumed to have left BellSouth to receive service from a competitor, and it is those remaining customers that appear on the lists that BellSouth provides to its retail personnel.

> Obviously, there are many other ways that BellSouth retail personnel may be informed that a BellSouth retail customer has chosen to accept one of the many local service offerings of the numerous CLECs that provide local exchange service in Tennessee. For example, a BellSouth retail employee may place a sales call to whom he or she believes is an existing customer only to learn, during the course of that call, that the customer recently switched from BellSouth to a CLEC. As another example, many large business customers are in frequent contact with members of the BellSouth account team that serve that customer. When such a customer leaves BellSouth for a competitor, it is not unusual for members of the account team that serve that customer to be aware of the switch as a result of the close contact they typically maintain with such customers.

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REQUEST: Is winback literature (e.g. letters to the end user) automatically triggered or is manual intervention required?

RESPONSE: BellSouth understands "winback literature" to mean written materials that are designed to attract former customers back to BellSouth. BellSouth further understands "automatically triggered" to mean that winback literature is sent to a given customer any time a given event is recorded with regard to that customer's records. Based on these understandings, BellSouth responds that no, "winback literature" is not automatically triggered.

Instead, BellSouth exercises its business judgment to decide whether to send "winback literature." When BellSouth sends "winback literature," it uses the customer lists described in BellSouth's Supplemental Response to Item No. 72 to determine to whom such literature is sent.

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REQUEST:

Describe every marketing or sales program in effect in Tennessee as of May 1, 2002 in which BellSouth or a BellSouth affiliate offers a non-regulated service or product which is linked to, or bundled with, the purchase of a regulated telecommunications service. This question is intended to include, but not be limited to, offerings in which:

- a. the purchaser of a regulated service is entitled to obtain a non-regulated service or product at a cheaper price than would otherwise be available to the purchaser.
- b. the purchaser of a non-regulated service or product is entitled to obtain a regulated service at a cheaper price than would otherwise be available to the purchaser.
- c. the purchaser of a regulated service receives any item of value other than as described in BellSouth's tariffs.

RESPONSE: The following offerings were available as of May 1, 2002 in Tennessee. Absent an indication to the contrary, these offerings continue to be available today.

Purchasers can receive the following discounts off Internet access and wireless services if they subscribe to a residential Area Plus and/or Complete Choice Package:

\$5.00 off the monthly rate for BellSouth's Dial Up Internet Service.

\$4.95 off the monthly rate for BellSouth's FastAccess DSL Service.

10% discount off the monthly access line rate for Cingular Wireless Plans.

10% discount off the monthly rate for BellSouth's Wireless E-Mail service.

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Purchasers can receive the following discounts on Internet access and wireless services if they subscribe to the Small Business Offering of Complete Choice for Business Package:

\$4.95 recurring monthly reward for unlimited access dial up internet service.

\$4.95 recurring monthly reward for FastAccess for Business ADSL Service.

10% discount off monthly access line rate for Cingular Wireless Plans.

\$1.95 recurring monthly credit for BellSouth's Wireless E-Mail Service.

Purchasers of a single or multi-line telephone set through Innotrac could receive a \$50 coupon redeemable towards that purchase if they also purchased Complete Choice for Business and signed a local service term election. This offer expired June 28, 2002.

Purchasers of the BellSouth Wireless Email T-900 paging service could receive a \$50 cash back coupon if they were also a new or existing Complete Choice for Business customer. This offer expired June 28, 2002.

Purchasers of FastAccess for Business DSL service can receive \$125 cash back if they also sign a new local service term election or if they have an existing local service term election with BellSouth.

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Purchasers of Cingular wireless services can receive the following discounts if they also sign a 36-month term election under the 2002 Key Customer Program:

\$10 monthly credit for 1 year towards any Cingular plan of \$39.99 or higher if they have 1-3 lines

\$20 monthly credit for 1 year toward any Cingular plan of \$39.99 or higher if they have 4+ lines

Purchasers of Internet access services could receive the following waivers or credits if they also signed a 2001 Key Customer program term election:

DSL

- 1 month waiver of service if they signed an 18-month term election;
- 2 months waiver of service if they signed a 36-month term election

DIA (Dedicated Internet Access)

\$30 monthly credit on dot net portion of the bill if they signed an 18-month term election

\$40 monthly credit on dot net portion of the bill if they sign a 36-month term agreement

This offer expired June 25, 2002.

Purchasers of Internet access services could receive the following waivers or credits if they also signed a term election under the Solutions Plus program:

DSL

- 1 month waiver of service if they signed a 24-month term election
- 2 months waiver of service if they signed a 36-month term election

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DIA (Dedicated Internet Access)

\$30 monthly credit on dot net portion of the bill if they signed a 24-month term election

\$40 monthly credit on dot net portion of the bill if they signed a 36-month term election

This offer expired June 25, 2002.

BellSouth DIA Plus

Purchasers of DIA (Dedicated Internet Access) T1 speeds and higher can receive an 11% discount on the monthly charge for that service if they also are qualifying BellSouth Business General Business customers that meet the eligibility requirements of the BellSouth Basic Service (1FBs and/or trunks under contract) and BellSouth Custom Advantage Programs (Regulated services under contract).

BellSouth FastAccess Plus

Purchasers of BellSouth Fast Access service can receive discounts on that service if they also are qualifying BellSouth Business General Business customers that meet the eligibility requirements of the BellSouth Basic Service (1FBs and/or trunks under contract) and BellSouth Custom Advantage Programs (Regulated services under contract). This offer expired June 30, 2002.

Frame Relay Cubed

Purchasers of router implementation services can receive a free Nortel 2430 or Cisco 2620 Router if they also sign a minimum 36 month letter of election for frame relay service. Purchasers of frame relay service who sign a minimum 24 month letter of election can receive waivers of certain charges associated with that service.

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BellSouth business customers who subscribe to new BellSouth® Centrex Service on a 24-month contract can receive a 100% installation waiver (A12.25 and A4 Service Order Charges). In addition to the installation waiver, BellSouth business customers who subscribe to new BellSouth® Centrex on a 36, 48, or 60-month contract will be eligible for a package price that includes:

BellSouth® Centrex (per line charge) \$43.00 including Common Equipment, Station Link,
Network Access Register (NAR)**, Hunting, and Standard Features
(Excluding taxes and state/local/federal charges & fees)

BellSouth® MemoryCall® Integrated Voice Fax Service \$ 6.00 (per mailbox)

CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2002, a copy of the foregoing document was served on the parties of record, via hand delivery, facsimile, overnight or US Mail, addressed as follows:

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	KMC Telecom III and V
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